



383621

## MEETING SUMMARY

CH2MHILL

## Conference Call with City of Kalamazoo to Discuss PRG Memorandum for Allied Landfill Tuesday, December 16, 2008 2:30 PM CST

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| <b>ATTENDEES:</b> | Michael Berkoff, USEPA<br>Paul Bucholtz, MDEQ<br>Daria Devantier, MDEQ<br>Suda Arakere, Millennium<br>Stephen Weisher, Millennium<br>Michael Erickson, Arcadis<br>Tim Scully-Granzeier, Arcadis<br>Jeff Keiser, CH2M HILL<br>Beth Rohde, CH2M HILL | Sara Hill, Kalamazoo River Cleanup<br>Coalition<br>Jeff Spoelstra, Kalamazoo River<br>Watershed Council<br>Bruce Merchant, City of Kalamazoo<br>Mike Wetzel, City of Kalamazoo<br>Gary Wegner<br>Bill Fox<br>Peter Collins, ASTI<br>Richard Burns, NTH Consultants<br>Robert Whitesides, Kalamazoo River<br>Watershed Council |
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### Opening Comments (Jeff Spoelstra)

The task force appreciates the opportunity to review and comment on the PRG Memorandum. They will submit comments and request a response from the USEPA.

### Rationale for PRG Memorandum

USEPA saw a need to provide guidance to the responsible party (RP) for development of the Feasibility Study (FS). A risk assessment was previously performed for the Kalamazoo River Superfund Site to determine if an unacceptable risk is present and action is required. Allied Landfill is an OU within the Kalamazoo River and it is known that remedial action is required at Allied Landfill, so an individual risk assessment is not necessary.

From the Future Use section of the memorandum:

*"It is U.S. EPA's intent that this summary of PRGs will be used by the Responsible Parties in the development of the FS. The information in this document will be compared to site-specific data and used in the development of an array of alternatives in the FS. U.S. EPA will use the information summarized in this TM in consideration of remedies for this OU."*

### Open Discussion

*(Questions and answers listed below provide a general summary, but are not intended as an official record of exact questions and responses. Duplicated questions are summarized and only listed once.)*

Q: What is the relationship of USEPA, Millenium, Arcadis, and CH2M HILL?  
A: Millenium is the RP who is obligated to perform remedial actions at Allied Landfill. Arcadis is Millenium's consultant. CH2M HILL is USEPA's consultant.

Q: Will the Brant Fisher memorandum be incorporated into the RI?

A: No, but the RP is preparing a groundwater work plan to further evaluate groundwater and the Brant Fisher memorandum is being considered in preparation of that work plan.

Q: Will the CSM be revised as a result of the groundwater investigation?

A: The CSM will be revised if the findings of the groundwater investigation indicate that this is a complete pathway. The CSM would not be revised if it were not complete.

Q: Elected officials are questioning the response to the task force on detailed comments and would like to arrange a meeting with USEPA representatives. Due to schedules, it will be necessary to know within a week if a meeting will be scheduled in January, otherwise it will not be possible to arrange a meeting until February.

A: Due to current availability of USEPA representatives and unforeseen circumstances, the meeting has not yet been scheduled, tentative dates are being worked on. USEPA will respond within a week if a meeting is to be set up for January.

Q: As discussed in the NTH report, it is believed that groundwater has not been fully evaluated. How will this be further evaluated and when?

A: Millenium has tasked Arcadis to perform a groundwater investigation. The Brant Fisher memorandum is being considered in the preparation of the work plan. The work plan is currently being drafted and will be discussed with the task force prior to collection of additional data in the field. The findings of the groundwater investigation will be used to revise the CSM if the results indicate there is a completed pathway and the results will be incorporated into the FS. Work may proceed on portions of the FS, but the FS will not be completed until after the groundwater investigation has been performed and results evaluated.

Q: When will the groundwater work plan be complete?

A: Arcadis anticipates the work plan will be submitted to the USEPA next week and then dates will be selected for discussion. USEPA will review the document as quickly as possible and then set up a call with the City.

Q: Why were air and groundwater pathways excluded from the CSM?

A: A technical memorandum was prepared in 1993 and 1994 for each of the OUs at Kalamazoo River to evaluate air quality. Based on a review of the RI report and these TMs, it is believed that these are insignificant or incomplete pathways.

Q: It is believed that the comments on the RI should be reference in the final version of the PRG memorandum.

A: The USEPA appreciates the effort and the content of the comments. However, the PRG memorandum is not the appropriate place to include such a reference. The PRG memorandum is to determine appropriate numbers for consideration as cleanup limits for this OU. It would be more appropriate to include a reference in the groundwater work plan or FS.

Q: Subsistence anglers are predominant in the area, not sport anglers. The criteria should be revised to be protective of subsistence anglers in the future if there are advancements that lower the detection limit.

A: The points being brought up are appreciated and important but are more appropriate for the entire Kalamazoo River site.

Q: Figure H-1 in the RI report shows a perched groundwater condition. This is not believed to be correct as the underlying soils are saturated.

A: The 122 wells need to be evaluated in context of all the wells and the entire site. The groundwater investigation will be used to provide additional data.

Q: Robert Whitesides was unable to locate a copy of V-W-98-C-473 and requested a copy.

A: USEPA will forward a copy.